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Federal Communications Commission
Office of the Secretary

February 13, 1991

To: Office of the Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

Subj: RM Number 7594

To Whom It May Concern:

With regard to the inquiry into the commission's policies and rules regarding AM Directional Antenna Performance Verification (RM No. 7594), it is the position of Kintronic Laboratories, Incorporated, a leading manufacturer of custom AM antenna systems, that this inquiry should be thoroughly investigated to the fullest extent possible soas to reduce the economic burden that is placed on the AM broadcaster in commencing the operation of a new AM station or in maintaining an AM station. There is no question that the computer aided design techniques available today permit the prediction of extremely accurate operating parameters as well as pattern field strengths for an AM directional array. Each time a new AM directional is installed, a new addition is made to the empirical data base, hence permitting further refinement to the computer models. Certainly there are extreme cases where physical structures, buildings, etc. will present sources of re-radiation, which the computer model would not account for. However in most cases, the shape and magnitude of the pattern can be well understood based on the field ratio and phase information provided from an antenna monitor. A partial proof should be sufficient to verify the pattern.

I hope that you will give inquiry RM No 7594 your fullest attention soas to improve the quality of AM radio service and to reduce the financial burden on the AM broadcaster in installing and maintaining an AM directional array. Thank you for your kind consideration of these comments.

Sincerely,

Tom F. King
President